

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**ELIZABETH SANTOS, TUNEKA GREEN, and  
MATTHEW MORRIS, on behalf of themselves and  
all others similarly situated,**

**Plaintiffs,**

**-against-**

**ERIC GOODE, SEAN MACPHERSON, and  
CHELSEA PARK LLC d/b/a The Park,**

**Defendants.**

**No. 13 Civ. 3085 (RJS)(HP)**

**NOTICE OF PLAINTIFFS' MOTION FOR APPROVAL OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, the Declaration of Rachel Bien in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement, and Approval of the FLSA Settlement, and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) Awarding Class Counsel \$141, 666 in attorneys' fees, which is one-third of the Settlement Fund;
- (2) Awarding Class Counsel \$2,000 in out-of-pocket expenses; and
- (3) Granting such other, further or different relief as the Court deems just and proper.

Dated: September 5, 2014  
New York, New York

Respectfully submitted,

By: /s/ Rachel Bien  
Rachel Bien

**Outten & Golden LLP**

Rachel Bien

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***Attorneys for Plaintiffs***